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11 *Attorneys for Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans*
12 *Servicing, LP*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 BANK OF AMERICA, N.A., AS
16 SUCCESSOR BY MERGER TO BAC HOME
17 LOANS SERVICING, LP,

18 Plaintiff,

19 vs.

20 NORTH AMERICAN TITLE INSURANCE
21 COMPANY, DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00415-KJD-VCF

25 **STIPULATION AND ORDER TO**
26 **EXTEND DEADLINE TO FILE A**
27 **~~PROPOSED~~ DISCOVERY PLAN**

28 **(Second Request)**

Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans Servicing, LP (“BANA”) and Defendant, North American Title Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree as follows:

1. On March 9, 2021, BANA filed its Complaint in Eighth Judicial District Court, Case No. A-21-830782-C [ECF No. 1-1];
2. On March 11, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
3. On November 8, 2022, the Parties filed a Joint Status Report advising the Court that the Parties attended a private mediation on September 29, 2022, which did not result in settlement. The Parties requested thirty (30) days to submit their proposed discovery plan [ECF No. 14];

4. The Parties subsequently stipulated to, and the Court approved, an extension until January 9, 2022 for the Parties to file a proposed discovery plan as BANA's counsel was unavailable due to a Ninth Circuit oral argument;
5. Counsel for BANA needs additional time to confer with its client in light of the recent holidays and is requesting an additional thirty (30) days, through and including February 8, 2023, to file the proposed discovery plan;
6. Counsel for NATIC does not oppose the requested extension;
7. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 9th day of January, 2023.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon, Esq.

Lindsay D. Dragon, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, Nevada 89117

Attorneys for Plaintiff, Bank of America,

N.A. as Successor by Merger to BAC Home

Loans Servicing, LP

DATED this 9th day of January, 2023.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair, Esq.

Kevin S. Sinclair, Esq.

Nevada Bar No. 12277

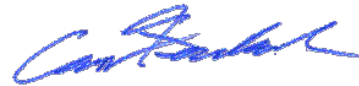
16501 Ventura Blvd, Suite 400

Encino, California 91436

Attorneys for Defendant, North American

Title Insurance Company

IT IS SO ORDERED.



Cam Ferenbach

United States Magistrate Judge

1-10-2023

DATED